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*Attorneys for Defendant ABN AMRO Bank N.V.  
(presently known as The Royal Bank of Scotland  
N.V.)*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

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In re:

BERNARD L. MADOFF,

Debtor.

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IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

v.

ABN AMRO BANK N.V. (presently known as  
THE ROYAL BANK OF SCOTLAND, N.V.),

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

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Adv. Pro. No. 10-05354 (SMB)

**NOTICE OF APPEAL**

**PLEASE TAKE NOTICE** that ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V. ("RBS/ABN"), hereby appeals pursuant to 28 U.S.C. § 158(a)(3),

from the attached Stipulated Order Denying Motion To Dismiss Complaint [10-05354, Dkt. No. 117], entered on March 3, 2017 by the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York, that gave effect to the Memorandum Decision Regarding Claims to Recover Foreign Subsequent Transfers [08-01789, Dkt. No. 14495], entered by the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York on November 22, 2016 that decided certain adversary proceedings returned the Bankruptcy Court following the entry of the Opinion and Order of the United States District Court for the Southern District of New York (Rakoff, J.), dated July 6, 2014, in *Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities LLC (In re Madoff Sec.)*, No. 12-mc-115 (JSR), [ECF No. 551]. Filed along with RBS/ABN's Notice of Motion for Leave to Appeal is its Memorandum of Law in Support of Motion For Leave to Appeal and the accompanying Declaration of Michael S. Feldberg in Support of RBS/ABN's Motion for Leave to Appeal, which attaches the *Opinion and Order* (attached thereto as "Exhibit A"), the *Memorandum Decision Regarding Claims To Recover Foreign Subsequent Transfers* (attached thereto as "Exhibit B"), and the *Stipulated Order Denying Motion To Dismiss Complaint* (attached thereto as "Exhibit C").

The names of all parties to the orders appealed from and the names, addresses, and telephone numbers of their respective attorneys are as follows:

<u>Party</u>	<u>Counsel</u>
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC	BAKER & HOSTETLER LLP David J. Sheehan Regina L. Griffin 45 Rockefeller Plaza New York, New York 10111 (212) 589-4201

Dated: April 11, 2017  
New York, New York

Respectfully submitted,

ALLEN & OVERY LLP

By: /s/ Michael S. Feldberg  
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